

aural service. Exhibit E, Figure 32 is an allocation study showing short spacings to KUDD channel 300C in Roy, UT and KAOX channel 297C in Kemmerer, WY. Exhibit E, Figure 33 shows the proposed city-grade contour for channel 288C from the proposed site. The city-grade contour easily covers 100% of American For, UT. Exhibit E, Figure 34 is a gain/loss study that demonstrates the proposed areas that channel 298C will cover and no longer cover as a result of the proposed relocation. Exhibit E, Figure 35 is a remaining services study showing the services that will continue to serve the loss area after channel 298C is deleted from Orem. It should be noted that the deletion of 298C from Orem will result in that community still retaining one local aural service: KOHS(FM) channel 219A.

Channel 300C Randolph, UT

In order to allocate channel 298C at American Fork, UT, the short spacing with channel 300C (KUDD) in Roy, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to delete channel 300C at Roy and allocate channel 300C at Randolph, UT, as that community's second local aural service. Exhibit E, Figure 36 is an allocation study showing a short spacing to KAOX channel 297C1 at Kemmerer, WY. Exhibit E, Figure 37 shows the proposed city-grade contour for channel 300C from the proposed site. The city-grade contour easily covers 100% of Randolph, UT. Exhibit E, Figure 38 is a gain/loss study that demonstrates the proposed areas that channel 300C will cover and no longer cover as a result of the proposed relocation. Exhibit E, Figure 39 is a remaining services study showing the services that will continue to serve the loss area after channel 300C is deleted from Roy. It should be noted that the deletion of 300C from Roy will result in that community still retaining one local aural service: KANN (AM) 1090 kHz.

Channel 293C/293C1 Superior, WY

The vacant allotment for channel 293C Superior, WY, was included in the recent FCC Auction 37. In order to allocate channel 292C at Evanston, the short spacing with the Original Allotment Site for 293C and the Proposed Original CP Site for 293C1 in Superior, WY, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 298C for channel 293C at Superior at the Original Allotment Site

and channel 298C1 for channel 298C1 at the Proposed Original CP Site with no site change needed at either location. Exhibit E, Figure 40 is an allocation study showing the proposed change at the Original Allotment Site with one short spacing: KAOX 297C1 in Kemmerer, WY. Exhibit E, Figure 41 is an allocation study showing the proposed change at the Proposed Original CP Site, with two short spacings: KAOX 297C1 in Kemmerer, WY, and KENZ 298C in Orem, UT. No Preferred Auction Sites were specified in Auction 37 for this station.

Channel 290C1/290C3 Thayne, WY

The vacant allotment for channel 290C1 Thayne, WY, was included in the recent FCC Auction 37. In order to allocate channel 290C at Centerville, UT, the short spacing with the vacant allotment site for channel 290C1 and the proposed original construction permit site for 290C3 in Thayne, WY, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 283C for channel 290C1 at Thayne at the vacant allotment site, which also may be substituted for channel 290C3 at the proposed construction permit site, with no site change needed at either location. Exhibit E, Figure 42 is an allocation study showing the proposed change at the Original Allotment Site with one short spacing: the proposed allotment of channel 283A at Ammon, ID. Exhibit E, Figure 42(a) is an allocation study showing the proposed change at the Proposed Original CP Site with the same short spacing of channel 283A at Ammon, ID. This is point at which the instant counter proposal becomes mutually exclusive with the petition for rule making in MB Docket 04-427.

Channel 245C2 / 245A Vernal, UT

In order to allocate channel 288C at Oakley, the short spacing with the permitted site for channel 288C2 (KLCY-FM) in Vernal, UT, must be eliminated. In order to allocate channel 290C at Centerville, the short spacing with the licensed site for channel 290A (KLCY-FM) in Vernal, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 245C2 for channel 288C2 at the KLCY-FM permitted site (or channel 245A for 290A at the KLCY-FM licensed site) with no site change needed. Exhibit E, Figure 43 is an allocation study showing the 245C2 at the Permitted

Site with no short spacings. Exhibit E, Figure 43(a) is an allocation study showing the 245A at the Licensed Site with no short spacings.

Channel 253C2 Naples, UT

To replace the loss of Naples' only local aural service, it is proposed that KIFX channel 253C2 Roosevelt, UT, be deleted from Roosevelt, UT, and added at Naples, UT, on channel 253C2. Exhibit E, Figure 44 is an allocation study showing no short spacings. Exhibit E, Figure 45 shows the proposed city-grade contour for channel 253C2 from the proposed site. The city-grade contour easily covers 100% of Naples, UT. Exhibit E, Figure 46 is a gain/loss study that demonstrates the proposed areas that channel 253C2 will cover and no longer cover as a result of the proposed relocation. Exhibit E, Figure 47 is a remaining services study showing the services that will continue to serve the loss area after channel 253C2 is deleted from Roosevelt. It should be noted that the deletion of 253C2 from Roosevelt will result in that community retaining two local aural services – KNEU (AM) 1250 kHz and KXRQ (FM) 232C1.

Conclusion

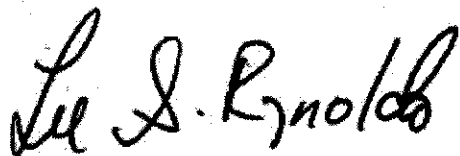
The Joint Parties' counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal produces a new first local service at Kaysville, Utah, American Fork, Utah, and Henefer, Utah, and a new second local service at Oakley, Utah, and Randolph, Utah. The counterproposal creates a net increase in new 60-dBu service of 25,936 square kilometers, and it provides a new 60 dBu service to 3,365,286 persons.

Statement of the Consultants

The instant engineering portion of a counterproposal was prepared for the Joint Parties and supports a counterproposal to MB Docket 04-427, RM-11127. It was developed by Reynolds Technical Associates (RTA) and may not be used for purposes other than submission to the Commission by the Joint Parties. It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:

A handwritten signature in black ink, reading "Lee S. Reynolds". The signature is written in a cursive style with a horizontal line underneath.

Lee S. Reynolds
January 24th, 2005

12585 Old Highway 280 East, Suite 102
Chelsea, Alabama 35043
(205) 618-2020

ENGINEERING STATEMENT

In Support of a
Counterproposal
MB Docket 04-427

Summary of Channel Assignments

(Depicting all communities, channels, and modifications)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Kaysville, UT	_____	286C	Delete channel 286C at Manti, Utah and allocate channel 286C at Kaysville, Utah, for use by KNJQ. The allocation of 286C will provide first local service to Kaysville with a population of 20,351 according to the 2000 US Census.
Manti, UT	286C, KMTI-AM	KMTI-AM	Channel 286C will be deleted at Manti and channel 286C allocated at Kaysville. Manti will continue to receive service from KMTI-AM, 650 kHz.
Oakley, UT	268C	268C, 288C	Delete channel 287C2 at Diamondville and allocate channel 288C at Oakley for use by KDWY. The allocation of 288C will provide second local service to Oakley with a population of 948 according to the 2000 US Census.
Diamondville, WY	287C2	223C1	Channel 287C2 will be deleted at Diamondville, WY, and channel 288C will be allocated at Oakley, UT. Diamondville will receive replacement service as channel 223C3 will be deleted at Naples, UT, and channel 223C1 will be allocated to Diamondville for use by KCUA.
Naples, UT	223C3	253C2	Channel 223C3 will be deleted at Naples, UT, and channel 223C1 will be allocated at Diamondville, WY. Naples will receive replacement service as channel 253C2 will be deleted at Roosevelt, UT, and channel 253C2 will be allocated to Naples for use by KIFX.
Roosevelt, UT	232C1, 253C2, KNEU-AM	232C1, KNEU-AM	Channel 253C2 will be deleted at Roosevelt and channel 253C2 allocated at Naples. Roosevelt will continue to receive service from KXRQ (FM) 232C1 and KNEU-AM, 1250 kHz.
Centerville, UT	289C	290C	Delete channel 289C at Centerville and allocate channel 290C at Centerville at the current site for KXRV.
Evanston, WY	252C2, 291C, KEVA-AM 1240 kHz	252C2, 292C, KEVA-AM 1240 kHz	Delete channel 291C at Evanston and allocate channel 292C at Evanston at the current site for KRMF.
Spanish Fork, UT	293C, KHQN-AM 1480 kHz	294C, KHQN-AM 1480 kHz	Delete channel 293C at Spanish Fork and allocate channel 294C at Spanish Fork at the current site for KOSY-FM.
Henefer, UT	_____	296C	Delete channel 295C at Brigham City, Utah, and allocate channel 296C at Henefer, Utah, for use by KRAR. The allocation of 296C will provide first local service to Henefer with a population of 684 according to the 2000 US Census.
Brigham City, UT	295C, 264C, KXOL-AM 1660 kHz	264C, KXOL-AM 1660 kHz	Channel 295C will be deleted at Brigham City and channel 296C allocated at Henefer. Brigham City will continue to receive service from KEGH(FM) 246C and KXOL-AM, 1660 kHz.
Kemmerer, WY	297C1, KMER-AM 950 kHz	230C2, KMER-AM 950 kHz	Delete channel 297C1 at Kemmerer and allocate channel 230C2 at Kemmerer at that community's reference coordinates.
Huntington, UT	296C2	237C2	Delete channel 296C2 at Huntington and allocate channel 237C2 at Huntington at the Auction 37 Original Allotment Site, Preferred Site, and Proposed Original CP Site for the new station.
Wellington, UT	237C3 (238A app)	223C3	Delete channel 237C3 at Wellington and allocate channel 223C3 at Wellington at the Auction 37 Original Allotment Site (or delete channel 238A at Wellington and allocate channel 223A at the Proposed Original CP Site for the new station).

Table 1 (continued)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
South Jordan, UT	223C2	223A	Downgrade Channel 223C2 at South Jordan to 223A at a modified site.
Rangely, CO	295C1	257C1	Delete channel 295C1 at Rangely and allocate channel 257C1 at Rangely at a modified site.
American Fork, UT	-----	298C	Delete channel 298C at Orem, Utah, and allocate channel 298C at American Fork, Utah, for use by KENZ. The allocation of 298C will provide first local service to American Fork with a population of 21,941 according to the 2000 US Census..
Orem, UT	219A, 298C	219A	Channel 298C will be deleted at Orem and channel 298C allocated at American Fork. Orem will continue to receive service from KOHS (FM) 219A.
Randolph, UT	272C	272C, 300C	Delete channel 300C at Roy, Utah, and allocate channel 300C at Randolph, Utah, for use by KUDD. The allocation of 300C will provide second local service to Randolph with a population of 483 according to the 2000 US Census.
Roy, UT	300C, KANN-AM 1090 kHz	KANN-AM 1090 kHz	Channel 300C will be deleted at Roy and channel 300C allocated at Randolph. Roy will continue to receive service from KANN (AM) 1090 kHz.
Superior, WY	293C (293 C1 app)	298C (298C1 app)	Delete channel 293C at Superior and allocate channel 298C at Superior at the Auction 37 Original Allotment Site (or delete channel 293C1 at Superior and allocate channel 298C1 at the Proposed Original CP Site for the new station).
Thayne, WY	290C1 (290C3 app)	283C1 (283C3 App)	Delete channel 290C1 at Thayne and allocate channel 283C1 at Thayne at the Auction 37 Original Allotment Site (or delete channel 290C3 at Thayne and allocate channel 283C3 at the Proposed Original CP Site for the new station).
Vernal, UT	290A (288C2 CP), KVEL-AM 920 kHz	245A (245C2 CP), KVEL-AM 920 kHz	Delete channel 290A at Vernal and allocate channel 245A at Vernal at the licensed site for KLCY-FM (and delete channel 288C2 at Vernal and allocate 245C2 at the KLCY-FM permitted site).

**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

Channel 286C (KNJQ) at Kaysville, UT Allocation Study

REFERENCE		DISPLAY DATES
41 15 27 N	CLASS = C	DATA 01-04-05
112 26 24 W	Current Spacings	SEARCH 01-19-05

----- Channel 286 - 105.1 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
Community of Kaysville			UT	49.10	120.4	
Reference coordinates:						
North Latitude: 41-01-59						
West Longitude: 111-56-10						
KBNZ.C	CP	285C0 Tremonton	UT	57.34	17.9	220.0 -162.66
KBNZ	LIC	285C2 Tremonton	UT	57.34	17.9	188.0 -130.66
Of no concern:						
Channel 285 at Tremonton, UT was deleted in MB Docket 02-290						
and allocated at Lyman, WY (see below)						
KNJQ	LIC-N	286C Manti	UT	181.63	156.1	290.0 -108.37
Of no concern:						
Licensed coordinates of KNJQ						
KDWH.C	CP	287C1 Diamondville	WY	147.92	63.1	209.0 -61.08
Of concern:						
Channel deleted and allocated on channel 288C at Oakley, UT in instant counterproposal						
KXRV	LIC	289C Centerville	UT	69.39	163.2	105.0 -35.61
Of concern:						
Changes to channel 290C at site						
KDWH	LIC	287C2 Diamondville	WY	174.01	67.5	188.0 -13.99
Of concern:						
Channel deleted and allocated on channel 288C at Oakley, UT in instant counterproposal						
AD288	PRO	288C Oakley	UT	128.80	109.1	105.0 23.80
Of note:						
Proposed allocation coordinates for KDWH in instant counterproposal						
KBNZ.A	APP	284C Lyman	WY	128.80	109.1	105.0 23.80
Of note:						
Coordinates currently used by KBNZ						
KVFX	LIC	233C Logan	UT	81.52	29.1	48.0 33.52

**Channel 286C (KNJQ)
Kaysville, UT
70 dBu Contour Map**

**Class C
70 dBu Contour**

**AD286
41-15-27
112-26-24**

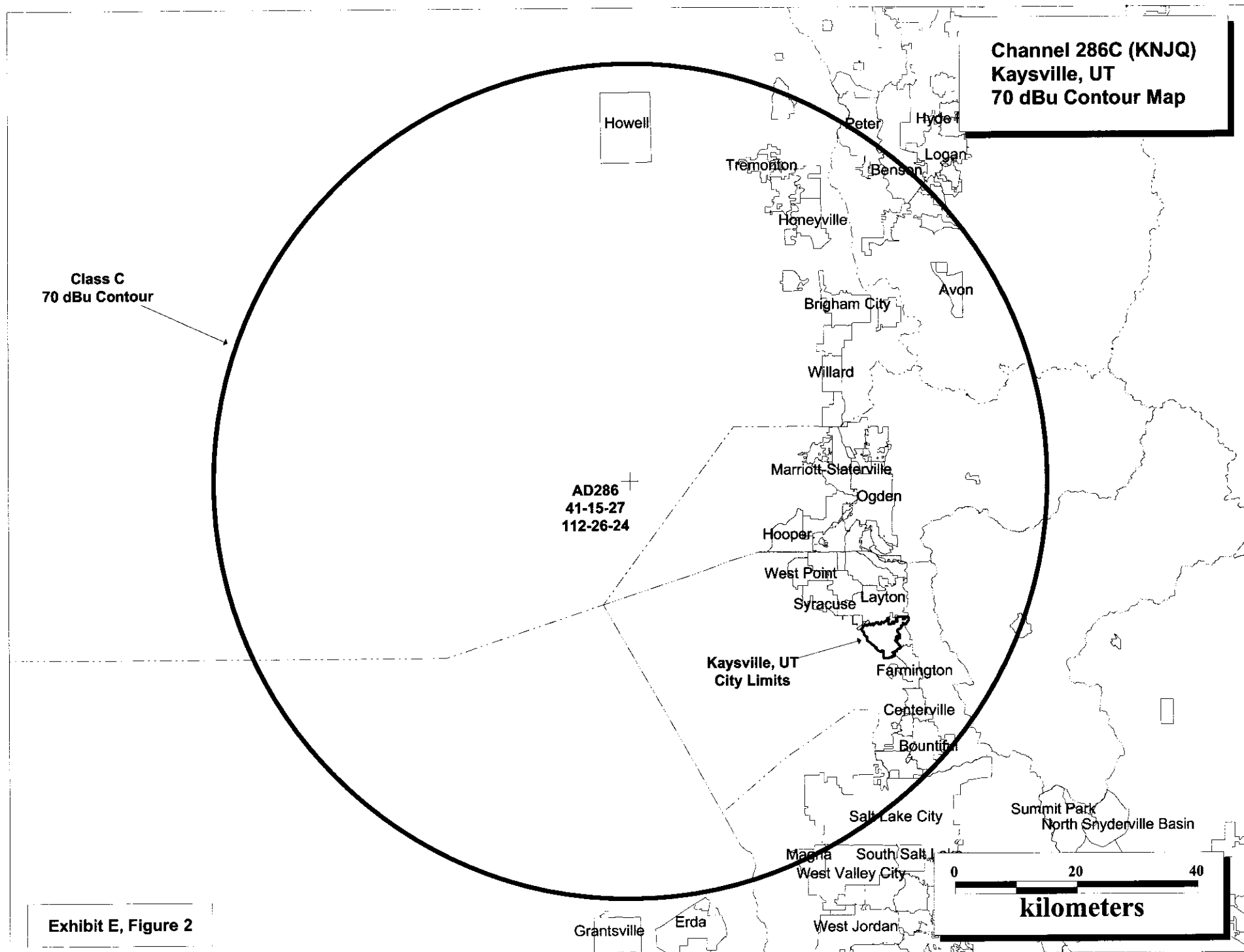
**Kaysville, UT
City Limits**

**Summit Park
North Snyderville Basin**

0 20 40

kilometers

Exhibit E, Figure 2



**Channel 286C (KNJQ)
Gain/Loss Study Map**

Gain Area = 27,678 sq. km
Loss Area = 25,119 sq. km
Pop. Gain = 1,436,300
Pop. Loss = 462,053

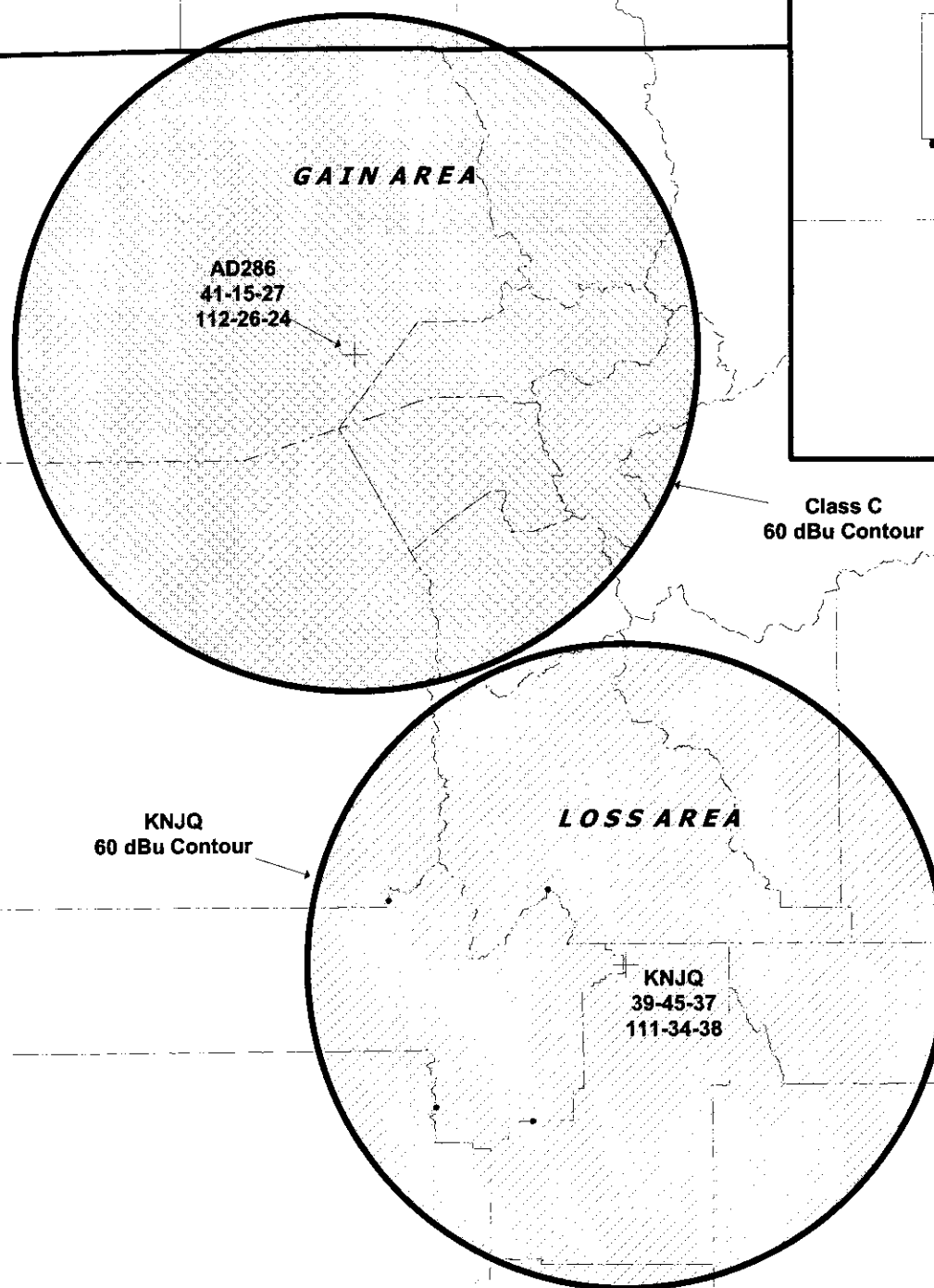


Exhibit E, Figure 3

Amount of Gray Area = 35 sq. km
Pop. In Gray Area = 0

Channel 286C (KNJQ)
Remaining Services
Study Map

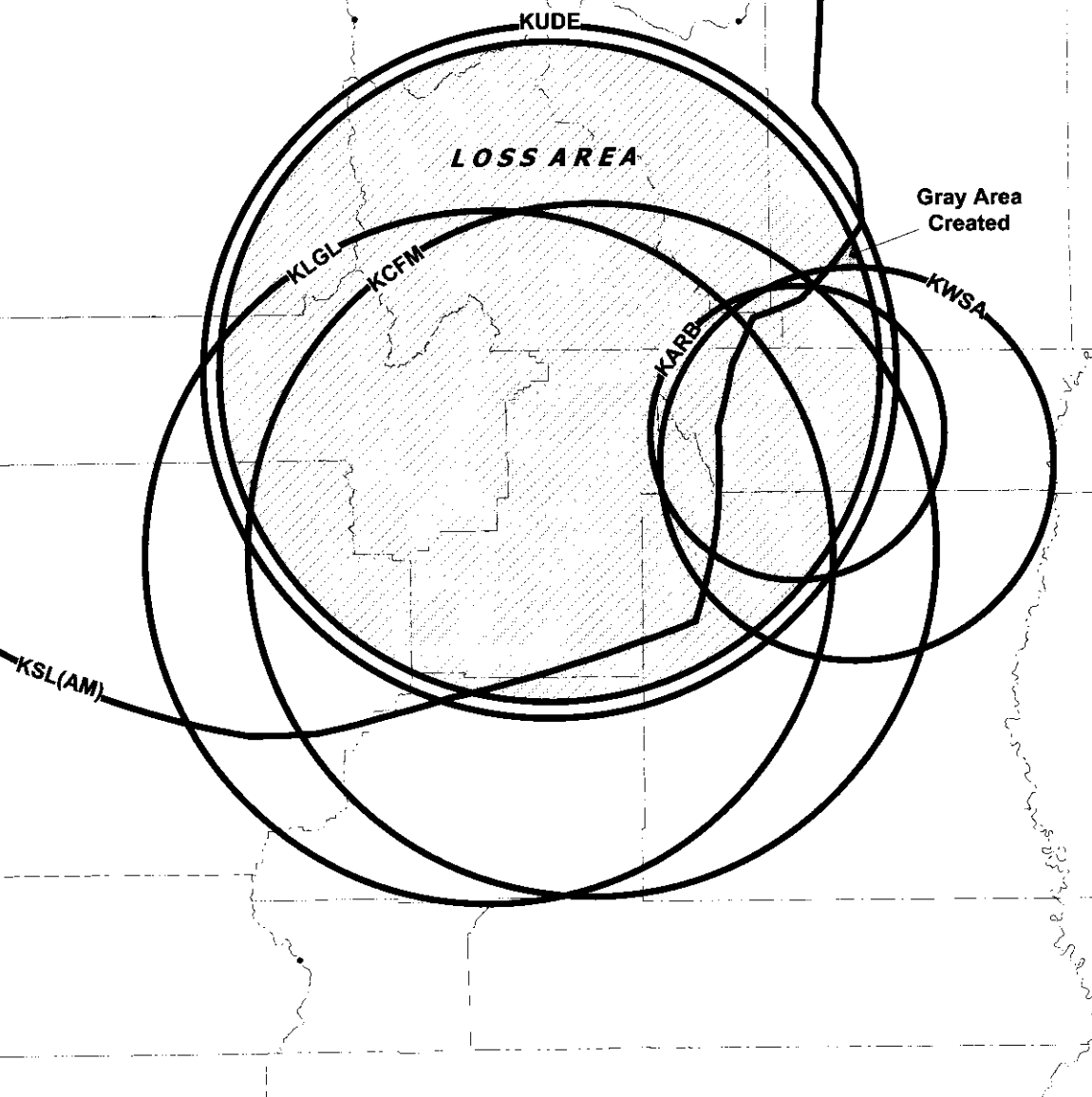


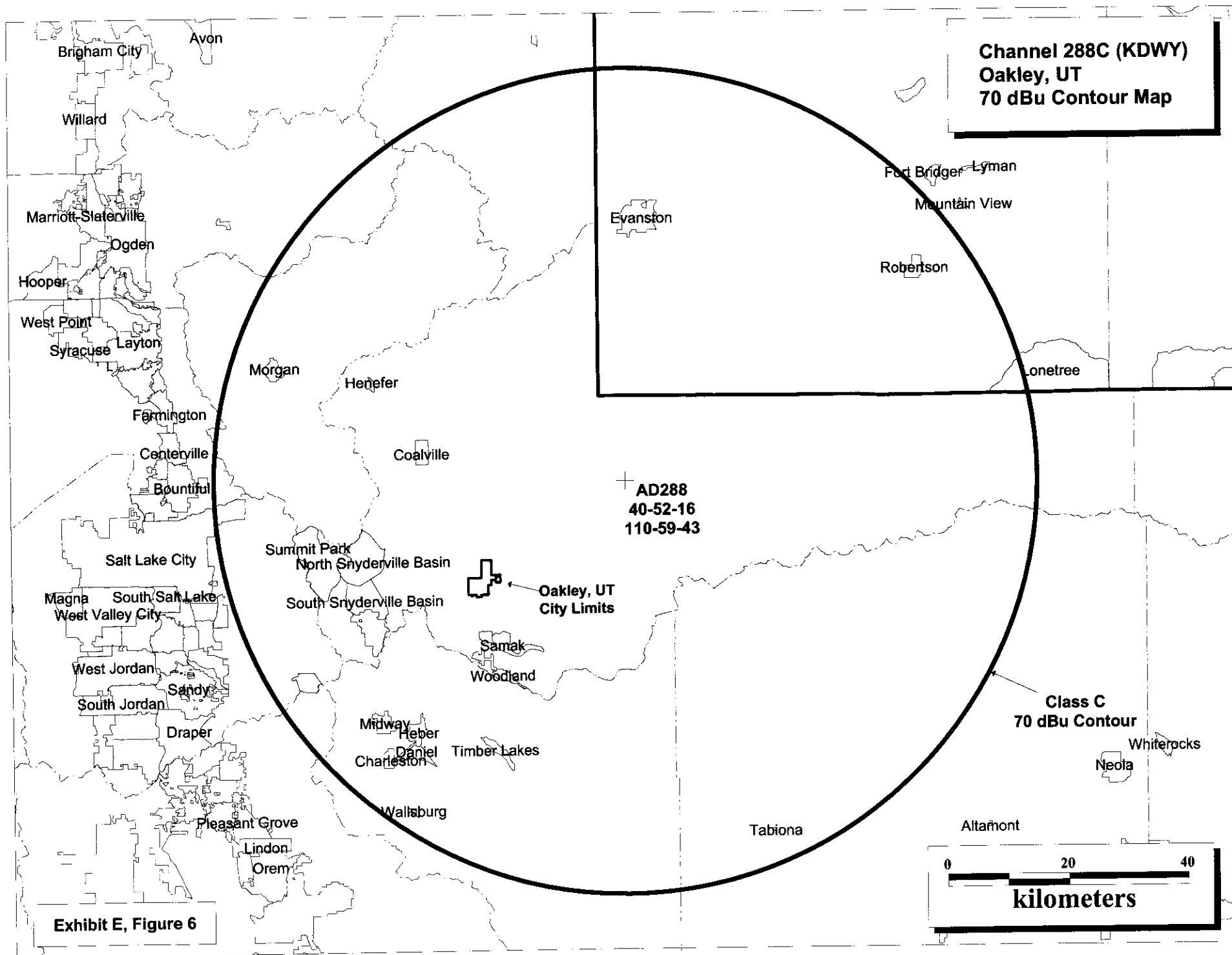
Exhibit E, Figure 4

**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

Channel 288C (KDWY) at Oakley, UT Allocation Study

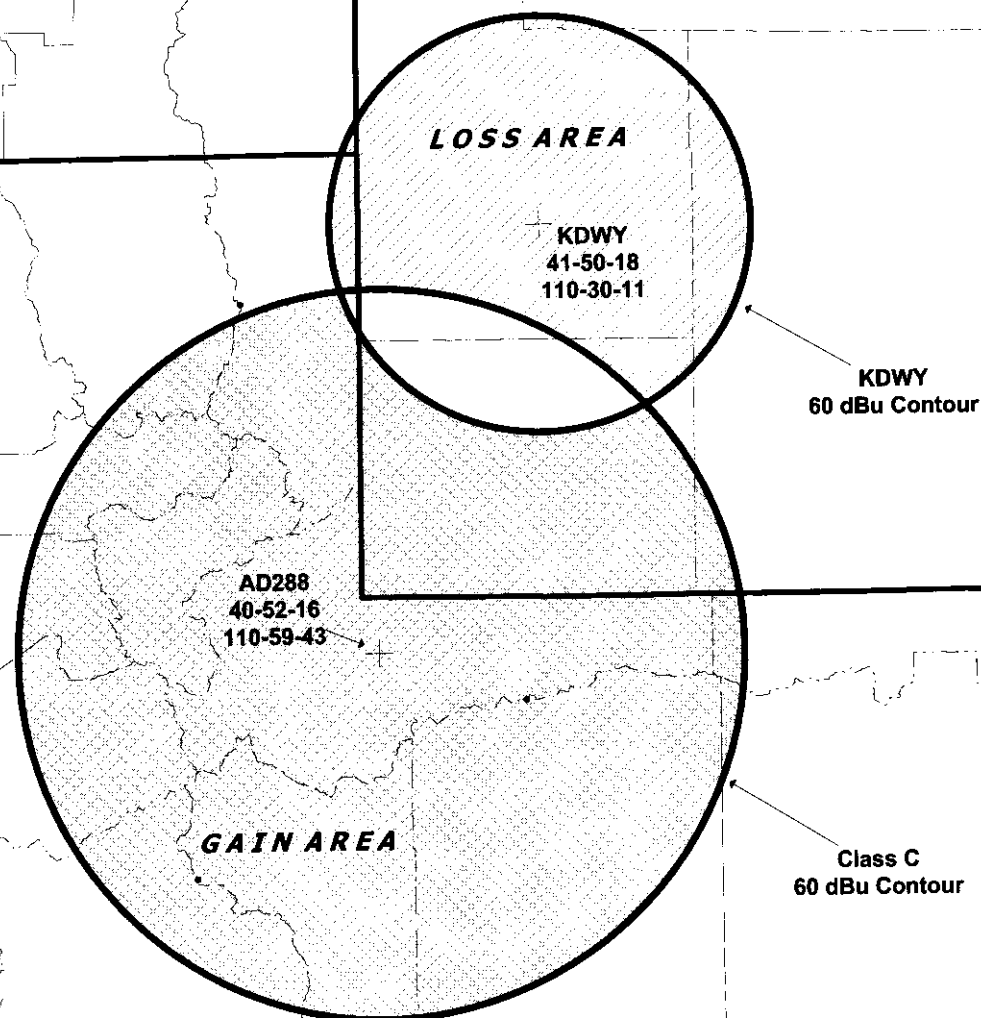
REFERENCE		DISPLAY DATES
40 52 16 N	CLASS = C	DATA 01-04-05
110 59 43 W	Current Spacings	SEARCH 01-19-05
----- Channel 288 - 105.5 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
<hr/>						
	Community of	Oakley	UT	29.94	235.5	
	Reference coordinates:					
	North Latitude: 40-43-07					
	West Longitude: 111-17-16					
<hr/>						
KXRV	LIC	289C	Centerville	UT	104.52	257.3 241.0 -136.48
	Of concern:					
	Changes to channel 290C at site in instant counterproposal					
<hr/>						
KLCYFM	CP -N	288C2	Vernal	UT	115.62	108.3 249.0 -133.38
	Of concern:					
	Changes to channel 245C2 at site in instant counterproposal					
<hr/>						
KRMF	RSV	291C	Evanston	WY	0.00	0.0 105.0 -105.00
KRMF	RSV	291C	Evanston	WY	0.00	0.0 105.0 -105.00
KRMF	RSV	291C	Evanston	WY	0.00	0.0 105.0 -105.00
KRMF	LIC	291C	Evanston	WY	0.00	0.0 105.0 -105.00
KRMF	RSV	291C	Evanston	WY	2.22	359.4 105.0 -102.78
	Of concern:					
	Changes to channel 292C at site in instant counterproposal					
<hr/>						
KDWY.C	CP	287C1	Diamondville	WY	109.11	6.3 209.0 -99.89
KDWY	LIC	287C2	Diamondville	WY	115.05	20.7 188.0 -72.95
	Of no concern:					
	Current coordinates for KDWY					
<hr/>						
AD290	PRO	290C	Centerville	UT	104.52	257.3 105.0 -0.48
	Of note:					
	Proposed facility of KXRV in instant counterproposal					
<hr/>						
KTHK	LIC-D	288C1	Idaho Falls	ID	287.93	343.5 270.0 17.93
<hr/>						
AD286	PRO	286C	Kaysville	UT	128.80	290.0 105.0 23.80
	Of note:					
	Proposed facility for KNJQ					
<hr/>						
KNJQ	LIC-N	286C	Manti	UT	132.90	202.0 105.0 27.90
KLCYFM	LIC	290A	Vernal	UT	129.05	112.8 95.0 34.05
<hr/>						



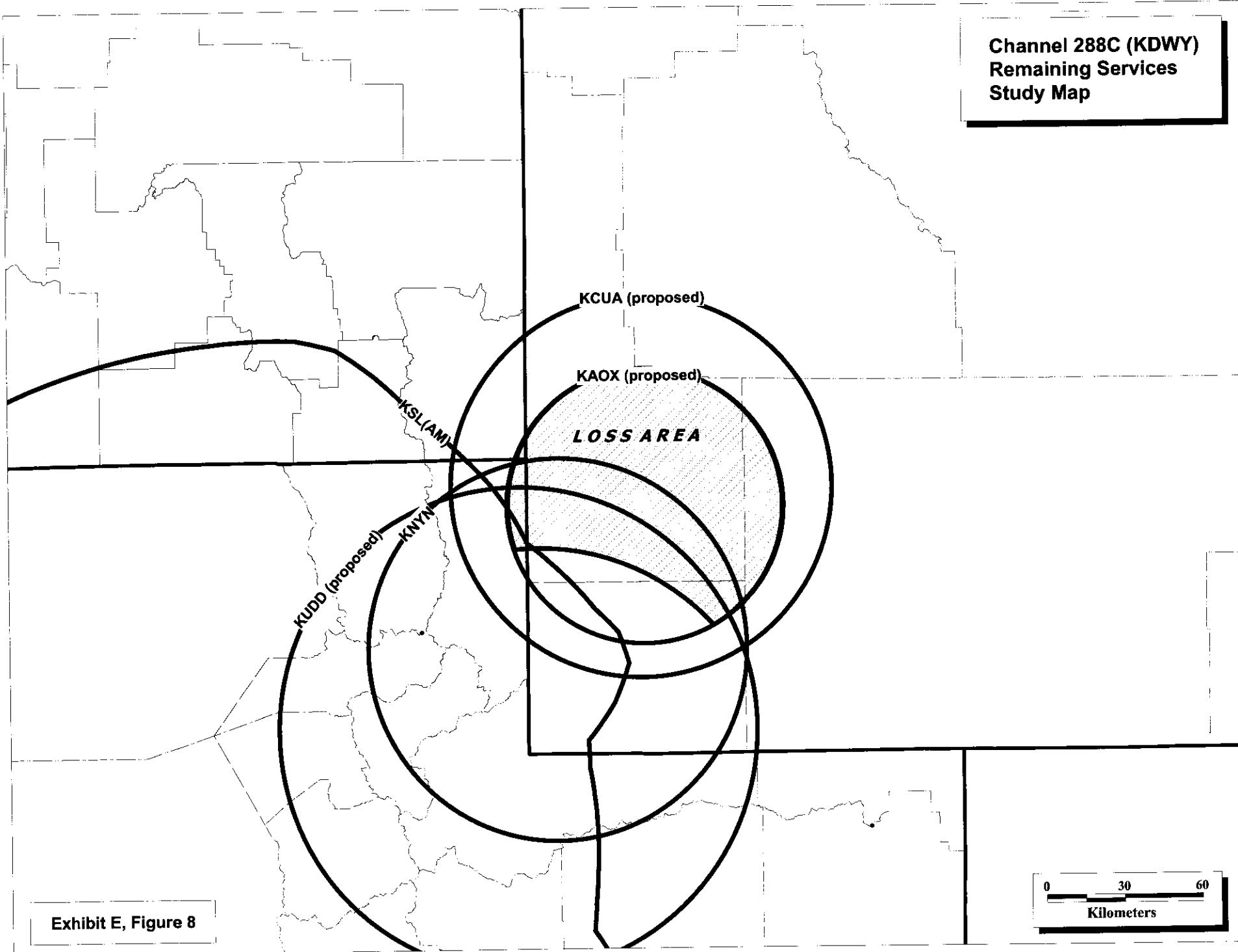
Gain Area = 24,850 sq. km
Loss Area = 6,947 sq. km
Pop. Gain = 1,512,845
Pop. Loss = 4,872

**Channel 288C (KDWY)
Gain/Loss Study Map**



0 30 60
Kilometers

**Channel 288C (KDWY)
Remaining Services
Study Map**



**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

Channel 290C (KXRV) at Centerville, UT Allocation Study

REFERENCE		DISPLAY DATES
40 39 34 N	CLASS = C	DATA 01-04-05
112 12 05 W	Current Spacings	SEARCH 01-19-05
----- Channel 290 - 105.9 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
Community of Centerville			UT	40.23	42.2	
Reference coordinates:						
North Latitude: 40-55-37						
West Longitude: 111-52-48						
KXRV	LIC 289C	Centerville	UT	0.00	0.0	241.0 -241.00
Of no concern:						
Licensed facility of KXRV						
KRMF	RSV 291C	Evanston	WY	104.52	76.6	241.0 -136.48
KRMF	LIC 291C	Evanston	WY	104.52	76.6	241.0 -136.48
KRMF	RSV 291C	Evanston	WY	104.52	76.6	241.0 -136.48
KRMF	RSV 291C	Evanston	WY	104.52	76.6	241.0 -136.48
KRMF	RSV 291C	Evanston	WY	105.00	75.4	241.0 -136.00
Of concern:						
Channel 292C proposed for KRMF at its current site in the instant counterproposal						
KOSYFM	LIC 293C	Spanish Fork	UT	0.00	0.0	105.0 -105.00
Of concern:						
Channel 294C proposed for KOSY at its current site in the instant counterproposal						
AP290	APP 290C1	Thayne	WY	244.92	16.1	270.0 -25.08
AL290	VAC 290C1	Thayne	WY	244.92	16.1	270.0 -25.08
Of concern:						
Channel 283C1 proposed as a substitute channel in the instant counterproposal						
KLCYFM	LIC 290A	Vernal	UT	222.69	96.2	226.0 -3.31
Of concern:						
Channel 245A substituted in instant counterproposal						
AD288	PRO 288C	Oakley	UT	104.52	76.6	105.0 -0.48
Of note:						
Proposed facility for KDWW						
AD292	PRO 292C	Evanston	WY	104.52	76.6	105.0 -0.48
Of note:						
Proposed facility for KRMF						
KRMV.C	CP -Z 291C0	Rupert	ID	219.89	328.4	220.0 -0.11
AL291	RSV 291C0	Rupert	ID	229.79	327.6	220.0 9.79

**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

Channel 292C (KRMF) at Evanston, WY Allocation Study

REFERENCE		DISPLAY DATES
40 52 16 N	CLASS = C	DATA 01-04-05
110 59 43 W	Current Spacings	SEARCH 01-19-05
----- Channel 292 - 106.3 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
Community of Evanston			WY	43.63	3.4	
Reference coordinates:						
North Latitude: 41-15-48						
West Longitude: 110-57-53						
KRMF	LIC	291C	Evanston	WY	0.00	0.0 241.0 -241.00
KRMF	RSV	291C	Evanston	WY	0.00	0.0 241.0 -241.00
KRMF	RSV	291C	Evanston	WY	2.22	359.4 241.0 -238.78
Of no concern:						
Current coordinates for KRMF						
KOSYFM	LIC	293C	Spanish Fork	UT	104.52	257.3 241.0 -136.48
Of concern:						
Changes to channel 294C at its current site in the instant counterproposal						
AP293	APP	293C	Superior	WY	196.78	58.8 241.0 -44.22
VA293	VAC	293C	Superior	WY	196.78	58.8 241.0 -44.22
Of concern:						
Changes to channel 298C at the current site in the instant counterproposal						
AD290	PRO	290C	Centerville	UT	104.52	257.3 105.0 -0.48
Of note:						
Proposed facility for KXRV in the instant counterproposal						
KXRV	LIC	289C	Centerville	UT	104.52	257.3 105.0 -0.48
AD294	PRO	294C	Spanish Fork	UT	104.52	257.3 105.0 -0.48
Of note:						
Proposed facility for KOSY						
KBJX	LIC	292C1	Shelley	ID	305.72	346.4 270.0 35.72
KRAR	LIC-N	295C	Brigham City	UT	144.92	314.9 105.0 39.92

**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

**Channel 294C (KOSY) at Spanish Fork, UT Allocation Study
(Using the current KOSY site as reference)**

REFERENCE				CLASS = C		DISPLAY DATES		
40 39 34 N						DATA 01-04-05		
112 12 05 W				Current Spacings		SEARCH 01-19-05		
----- Channel 294 - 106.7 MHz -----								
Call	Channel		Location		Dist	Azi	FCC	Margin

KOSYFM	LIC	293C	Spanish Fork	UT	0.00	0.0	241.0	-241.00
Of no concern: Licensed coordinates of KOSY								
KRAR	LIC-N	295C	Brigham City	UT	124.93	358.8	241.0	-116.07
Of concern: Channel 296C at Henefer, UT substituted in instant counterproposal								
KRMF	RSV	291C	Evanston	WY	104.52	76.6	105.0	-0.48
KRMF	RSV	291C	Evanston	WY	104.52	76.6	105.0	-0.48
AD292	PRO	292C	Evanston	WY	104.52	76.6	105.0	-0.48
Of note: Proposed KRMF facility								
KRMF	LIC	291C	Evanston	WY	104.52	76.6	105.0	-0.48
AD296	PRO	296C	Henefer	UT	104.52	76.6	105.0	-0.48
Of note: Proposed KRAR facility								
KRMF	RSV	291C	Evanston	WY	104.52	76.6	105.0	-0.48
KRMF	RSV	291C	Evanston	WY	105.00	75.4	105.0	0.00

**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

Channel 296C (KRAR) at Henefer, UT Allocation Study

REFERENCE		DISPLAY DATES
40 52 16 N	CLASS = C	DATA 01-04-05
110 59 43 W	Current Spacings	SEARCH 01-19-05
----- Channel 296 - 107.1 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
<hr/>						
	Community of	Henefer	UT 45.32	291.1		
	Reference coordinates:					
	North Latitude: 41-00-58					
	West Longitude: 111-29-54					
<hr/>						
AP296	APP 296C2	Huntington	UT 149.18	171.4	249.0	-99.82
	Of concern:					
	Changes to channel 237C2 at current site in the instant counterproposal					
KRAR	LIC-N 295C	Brigham City	UT 144.92	314.9	241.0	-96.08
	Of no concern:					
	Licensed coordinates of KRAR					
KAOX	LIC 297C1	Kemmerer	WY 115.05	20.7	209.0	-93.95
	Of concern:					
	Channel 230C2 proposed as a substitute in the instant counterproposal					
AP296	APP 296C2	Huntington	UT 171.51	179.1	249.0	-77.49
AL296	VAC 296C2	Huntington	UT 171.51	179.1	249.0	-77.49
	Of concern:					
	Channel 237C2 proposed at current site in instant counterproposal					
KAOX	RSV 297C2	Kemmerer	WY 115.05	20.7	188.0	-72.95
KAOX.A	APP 297C2	Kemmerer	WY 115.05	20.7	188.0	-72.95
	Of concern:					
	Channel 230C2 proposed as a substitute in the instant counterproposal					
AL295	VAC 295C1	Rangely	CO 205.16	114.5	209.0	-3.84
	Of concern:					
	Channel 257C1 proposed at a new site in the instant counterproposal					
KENZ	LIC 298C	Orem	UT 103.13	230.7	105.0	-1.87
	Of concern:					
	Channel 298C at American Fork, UT proposed as a substitute in the instant counterproposal					
AD294	PRO 294C	Spanish Fork	UT 104.52	257.3	105.0	-0.48
	Of note:					
	Proposed facility for KOSY					
KOSYFM	LIC 293C	Spanish Fork	UT 104.52	257.3	105.0	-0.48
AD298	PRO 298C	American Fork	UT 104.52	257.3	105.0	-0.48
	Of note:					
	Proposed KENZ facility					

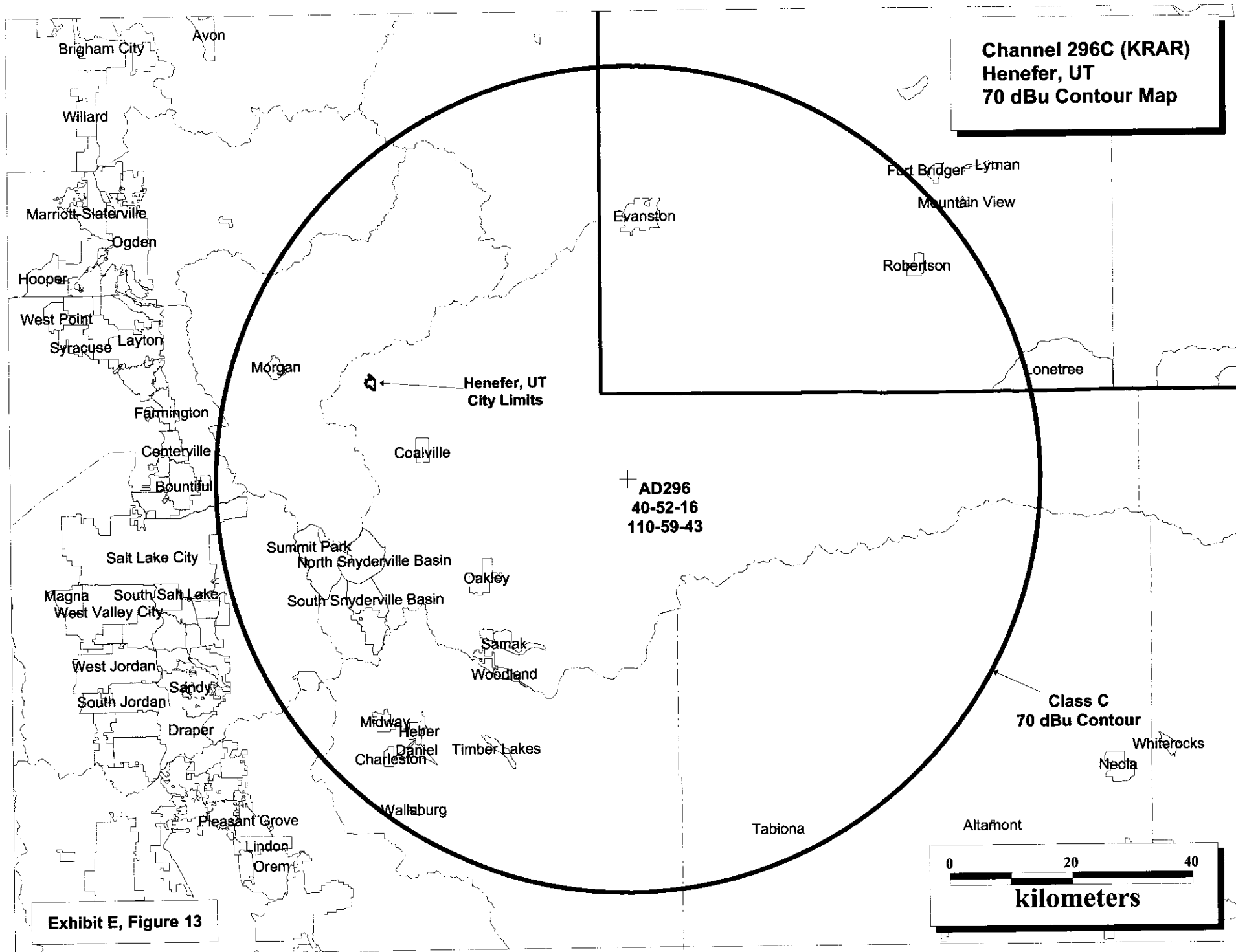


Exhibit E, Figure 13

Gain Area = 23,480 sq. km
Loss Area = 23,480 sq. km
Pop. Gain = 1,291,351
Pop. Loss = 288,029

**Channel 296C (KRAR)
Gain/Loss Study Map**

KRAR
60 dBu Contour

LOSS AREA

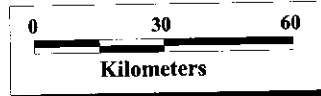
KRAR
41-47-03
112-13-55

GAIN AREA

AD296
40-52-16
110-59-43

Class C
60 dBu Contour

Exhibit E, Figure 14



**Channel 296C (KRAR)
Remaining Services
Study Map**

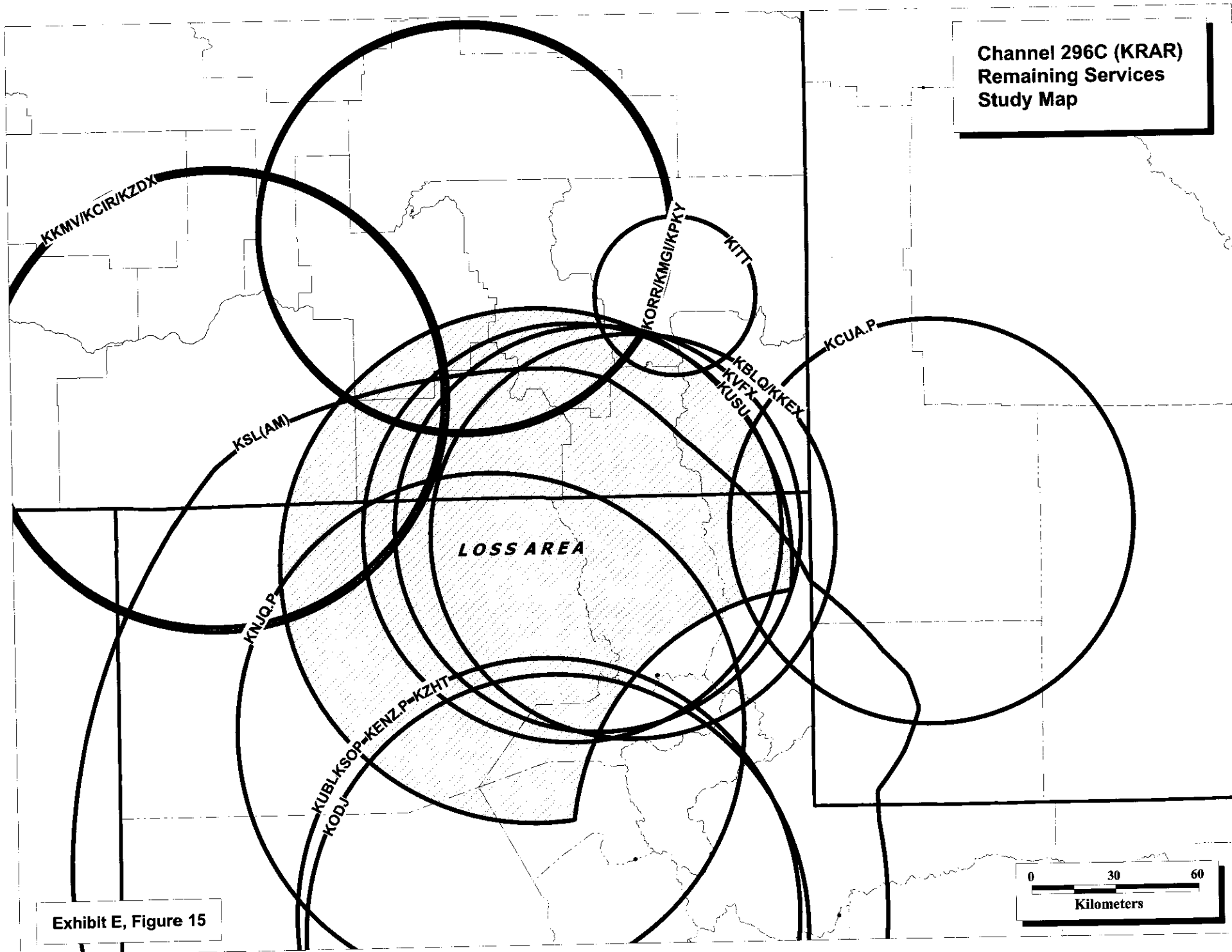


Exhibit E, Figure 15

**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

**Channel 230C2 (KAOX) at Kemmerer, WY Allocation Study
(Using the community's center coordinates as reference)**

REFERENCE		DISPLAY DATES
41 47 03 N	CLASS = C2	DATA 01-04-05
110 33 20 W	Current Spacings	SEARCH 01-19-05
----- Channel 230 - 93.9 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
KODJ	LIC 231C	Salt Lake City	UT 187.92	226.3	188.0	-0.08
KTAK	LIC 230C1	Riverton	WY 224.36	61.5	224.0	0.36
KVFX	LIC 233C	Logan	UT 117.39	276.6	105.0	12.39
KZBQ	LIC 229C	Pocatello	ID 201.16	307.4	188.0	13.16
KZBQ.A	APP 229C0	Pocatello	ID 201.27	307.3	176.0	25.27
KZBQ.A	APP 229C0	Pocatello	ID 201.27	307.3	176.0	25.27
RADD	ADD 229C	Levan	UT 224.70	197.1	188.0	36.70

Gain Area = 0 sq. km
Loss Area = 7,833 sq. km
Pop. Gain = 0
Pop. Loss = 8,789

**Channel 230C2 (KAOX)
Gain/Loss Study Map**

AD230
41-47-03
110-33-20

+

KAOX
41-50-18
110-30-11

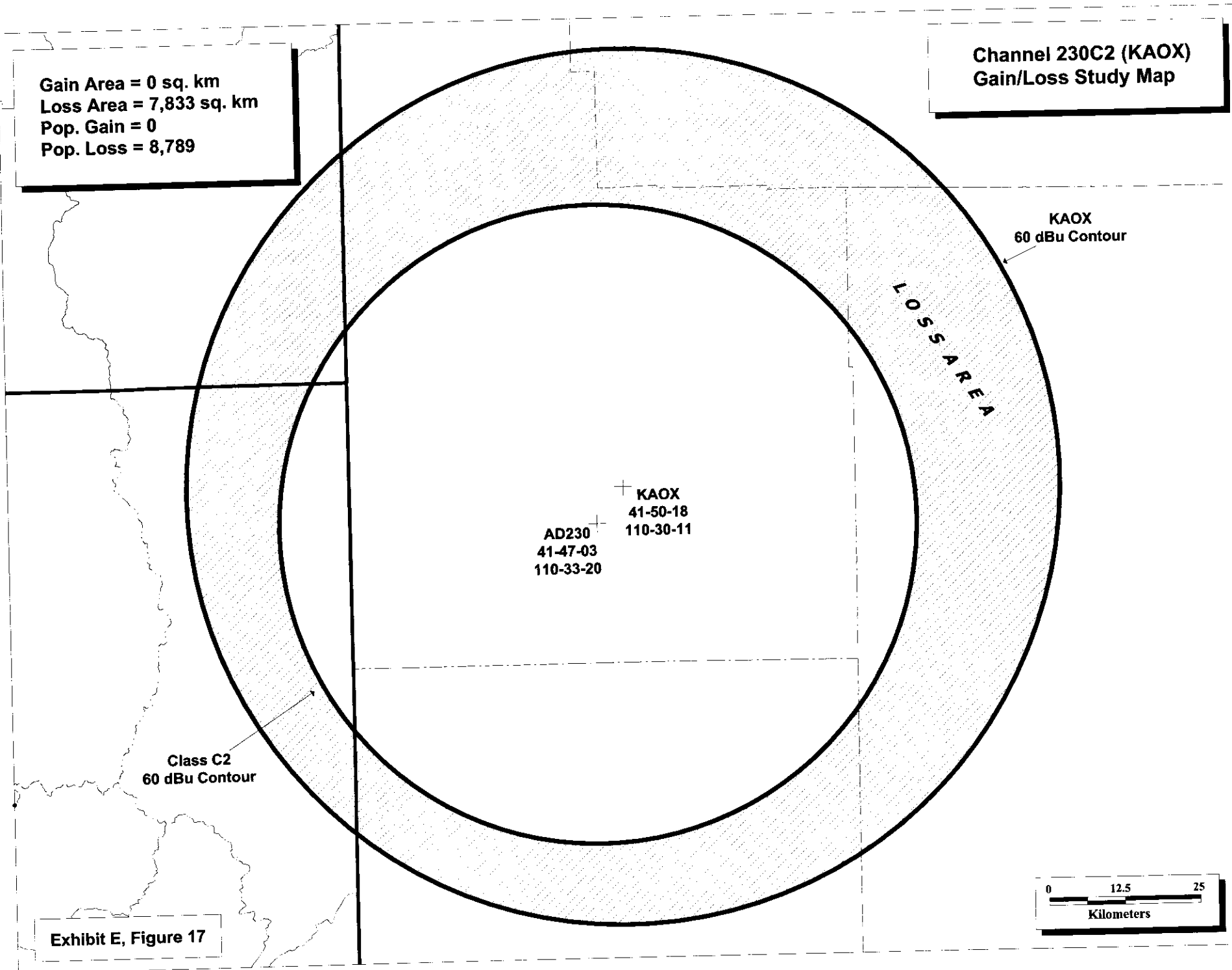
KAOX
60 dBu Contour

LOSS AREA

Class C2
60 dBu Contour

0 12.5 25
Kilometers

Exhibit E, Figure 17



**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

**Channel 237C2 at Huntington, UT Allocation Study
(Using the allocation/College Creek channel 296C2 site as reference)**

REFERENCE		DISPLAY DATES
39 19 36 N	CLASS = C2	DATA 01-04-05
110 57 50 W	Current Spacings	SEARCH 01-19-05
----- Channel 237 - 95.3 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
VA237	VAC 237C3	Castle Dale	UT 13.53	201.6	177.0	-163.47
Of no concern:						
Channel 271C3 substituted for channel 237C3 in MB Docket 02-14						
AP237	APP 237C3	Wellington	UT 31.04	39.3	177.0	-145.96
AL237	VAC 237C3	Wellington	UT 31.04	39.3	177.0	-145.96
Of concern:						
Channel 223C3 proposed as a substitution in the instant counterproposal						
KMGR	LIC 240C1	Delta	UT 95.48	298.6	79.0	16.48
KHTB	LIC 235C	Provo	UT 134.93	322.3	105.0	29.93

**Engineering Statement
In Support of a Counterproposal
MB Docket 04-427**

**Channel 237C2 at Huntington, UT Allocation Study
(Using the site specified in BNPH-20041227ACP as reference)**

REFERENCE		DISPLAY DATES
39 12 35 N	CLASS = C2	DATA 01-04-05
111 08 29 W	Current Spacings	SEARCH 01-24-05
----- Channel 237 - 95.3 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
VA237	VAC 237C3	Castle Dale	UT 10.35	87.7	177.0	-166.65

Of no concern:

Channel 271C3 substituted for channel 237C3 in MB Docket 02-14

AL237	VAC 237C3	Wellington	UT 50.92	43.2	177.0	-126.08
AP237	APP 237C3	Wellington	UT 50.92	43.2	177.0	-126.08
AP238	APP 238A	Wellington	UT 52.61	32.2	106.0	-53.39

Of concern:

Channel 223C3 proposed as a substitution in the instant counterproposal

KMGR	LIC	240C1	Delta	UT	90.15	310.5	79.0	11.15
KHTB	LIC	235C	Provo	UT	137.25	330.6	105.0	32.25